

Adam E. Polk (SBN 273000)
Simon S. Grille (SBN 294914)
Trevor T. Tan (SBN 280145)
Reid Gaa (SBN 330141)
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846
apolk@girardsharp.com
sgrille@girardsharp.com
ttan@girardsharp.com
rgaa@girardsharp.com

Counsel for Plaintiffs

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIA
MACK, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**JOINT NOTICE REGARDING
CLASS ACTION SETTLEMENT**

1 Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and
2 Denovias Mack (“Plaintiffs”) and Defendant Patreon, Inc. (“Patreon”), hereby respectfully notify the
3 Court of recent developments related to the class action Settlement in this case, as set forth below:

4 **Background:**

5 On August 2, 2024, Plaintiffs filed their motion for preliminary approval of the class action
6 Settlement in this case. *See* ECF No. 176. Plaintiffs’ motion stated that (1) Patreon’s records indicate
7 that “approximately 6 million Patreon account holders accessed video content on patreon.com while in
8 the United States during the Class Period.” *Id.* at 12. Plaintiffs’ motion further stated that, based on
9 information provided by the parties, the Claims Administrator (Simpluris, Inc.) “anticipates notice and
10 administration expenses in the range of \$300,000-\$350,000.” *Id.* at 8.

11 On September 23, 2024, the Court granted preliminary approval of the class action Settlement
12 and appointed Simpluris to serve as the Claims Administrator. *See* ECF No. 192.

13 **Developments**

14 On October 4, 2024, pursuant to section 6.1 of the Settlement Agreement (*see* ECF No. 176-1),
15 Patreon provided Simpluris with the names and email addresses that Patreon has for all potential class
16 Members (the “Potential Class List”). The Potential Class List contains information for a total of
17 8,653,241 Patreon account holders, of which, Simpluris has indicated, 8,168,662 have valid email
18 addresses and will receive direct Notice of the Settlement.

19 The increase – from the “approximately 6 million” figure to the 8-million figures discussed
20 above – is due to limitations in Patreon’s records associated with the time periods when the Meta Pixel
21 was operative on its website, and the parties wish to give notice to the broadest potential group of Class
22 members.

23 Based on the 8,168,662 figure, Simpluris has provided a revised not-to-exceed estimate of
24 \$425,000, to perform notice and administration for the Settlement.

25 Plaintiffs and Patreon each continue to believe that the Settlement is fair, reasonable, and
26 adequate for the Class.

27 Plaintiffs will arrange to have the Claims Administrator post this Notice on the Settlement
28 Website.

1 Dated: October 13, 2024

Respectfully submitted,

2 By: /s/ Simon S. Grille

3 Adam E. Polk (SBN 273000)
4 Simon S. Grille (SBN 294914)
5 Trevor T. Tan (SBN 280145)
6 Reid Gaa (SBN 330141)
7 GIRARD SHARP LLP
8 601 California Street, Suite 1400
9 San Francisco, CA 94108
10 Telephone: (415) 981-4800
11 Facsimile: (415) 981-4846
12 apolk@girardsharp.com
13 sgrille@girardsharp.com
14 ttan@girardsharp.com
15 rgaa@girardsharp.com

Counsel for Plaintiffs

13 Dated: October 13, 2024

By: /s/ Nathan Walker

14 Fred Norton (CA SBN 224725)
15 fnorton@nortonlaw.com
16 Nathan Walker (CA SBN 206128)
17 nwalker@nortonlaw.com
18 Bree Hann (CA SBN 215695)
19 bhann@nortonlaw.com
20 Gil Walton (CA SBN 324133)
21 gwalton@nortonlaw.com
22 Celine G. Purcell (CA SBN 305158)
23 cpurcell@nortonlaw.com
24 Emily Kirk (CA SBN 348547)
25 ekirk@nortonlaw.com
26 THE NORTON LAW FIRM PC
27 299 Third Street, Suite 200
28 Oakland, CA 94607
Telephone: (510) 906-4900

Attorneys for Defendant

PATREON, INC.

ATTESTATION

I, Simon Grille, am the ECF User whose ID and password are being used to file this document.
In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Dated: October 13, 2024

/s/ Simon Grille

Simon Grille